

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHANIE JONES and JONESWORKS LLC,

Plaintiffs,

-against-

JENNIFER ABEL, MELISSA NATHAN,  
JUSTIN BALDONI, WAYFARER STUDIOS LLC,  
and JOHN DOES 1 - 10,

Defendants.

Civ. Action No. 1:25-cv-779

**NOTICE OF REMOVAL**

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PLEASE TAKE NOTICE, that pursuant to 28 U.S.C. §§1332, 1441 and 1446, defendants Jennifer Abel, Melissa Nathan, Justin Baldoni, and Wayfarer Studios LLC (collectively, “Defendants”), by their attorneys, Meister Seelig & Fein PLLC, hereby file this Notice of Removal with this Court for removal of the above-captioned action from the Supreme Court of the State of New York, County of New York, to this Court. In support of this Notice of Removal, Defendants state as follows:

1. On December 24, 2024, Plaintiffs Stephanie Jones and Jonesworks LLC (collectively, “Plaintiffs”) filed a Summons, Complaint, Request for Judicial Intervention, and Commercial Division Addendum (collectively, the “State Court Papers”) in the Supreme Court of the State of New York, County of New York (the “State Court Action”), and the matter was assigned index number 659849/2024. True and correct copies of the State Court Papers are attached as **Exhibit 1**.

2. As of this date, Defendants have not filed a responsive pleading, and no other proceedings have transpired in the State Court Action.

**Basis for Removal and Jurisdiction**

3. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a), and this action may be removed by Defendants pursuant to the provisions of 28 U.S.C. §§ 1441(a) and 1446 because it is a civil action wherein: (1) complete diversity of citizenship exists among the parties; and (2) the amount of controversy exceeds \$75,000.00, exclusive of interest and costs.

4. There is complete diversity of citizenship between Plaintiffs and Defendants in this action.

5. In the Complaint, plaintiff Stephanie Jones alleges that she resides in Greenwich, Connecticut. (Ex. 1, Compl., ¶ 18). Attached as **Exhibit 2** is a deed evidencing that Stephanie Jones owns residential property at 15 Mountain Laurel Drive, Greenwich, CT 06830. *See Braten v. Kaplan*, No. 07-cv-8498, 2009 WL 614657, at \*3 (S.D.N.Y. Mar. 10, 2009) (listing “whether [s]he owns ... property” as a factor in determining a person’s domicile), *aff’d*, 406 Fed. Appx. 516 (2d Cir. 2016). Stephanie Jones does not allege any other residences or any intention to reside elsewhere. According to a database maintained by the State of Connecticut’s Secretary of State, Stephanie Jones is registered to vote in Connecticut. *See Morrison v. Blitz*, No. 88-cv-5607, 1996 WL 403034, at \*2 (S.D.N.Y. July 18, 1996) (voter registration is proof of domicile and intent to remain). A true and correct copy of a printout from the Secretary of State’s website, reflecting the voter registration, is attached as **Exhibit 3**. Hence, Jones is a citizen of the State of Connecticut.

6. The Complaint alleges that plaintiff Jonesworks is a limited liability company formed in the State of Delaware. (Ex. 1, Compl., ¶ 17). For diversity of jurisdiction purposes, limited liability companies take on the citizenship of each of their members. *See Handelsman v. Bedford Vill. Assc. Ltd. P’ship*, 213 F.3d 48, 51 – 52 (2d Cir. 2000). According to a Statement of Information filed by Jonesworks on August 30, 2024 with the State of California’s Secretary of

State, the members of Jonesworks are Stephanie Jones, Jason Hodes, and Brent Montgomery. True copies of filings made by Jonesworks with the California Secretary of State are attached as **Exhibit 4**.

7. The address of 211 East 43<sup>rd</sup> Street, New York, NY 10017 listed in the Statement of Information for Stephanie Jones and Jason Hodes is a commercial building<sup>1</sup> in which Jonesworks maintains an office and is not the residence or domicile of either of them. As noted above, Stephanie Jones is a citizen of the State of Connecticut. Jason Hodes is married to Stephanie Jones and they jointly own residential property at 15 Mountain Laurel Drive, Greenwich, CT 06830. (Ex. 2). According to a database maintained by the State of Connecticut's Secretary of State, Jason Hodes is registered to vote in Connecticut. A true and correct copy of a printout from the Secretary of State's website, reflecting the voter registration, is attached as **Exhibit 5**. Hence, Jason Hodes is a citizen of the State of Connecticut.

8. The address of 484 Pacific Street, Stamford, CT 06902 listed in the Statement of Information for Brent Montgomery is a commercial building<sup>2</sup> and is not his residence or domicile. Brent Montgomery resides at 23 Hendrie Drive Extension, Old Greenwich, CT 06870. According to a database maintained by the State of Connecticut's Secretary of State, Brent Montgomery is registered to vote in Connecticut. *See Morrison v. Blitz*, No. 88-cv-5607, 1996 WL 403034, at \*2 (S.D.N.Y. July 18, 1996) (voter registration is proof of domicile and intent to remain). A true and correct copy of a printout from the Secretary of State's website is attached as **Exhibit 6**. Therefore, Brent Montgomery is a citizen of the State of Connecticut.

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<sup>1</sup> [Welcome to 211 East 43rd Street's Tenant® Portal](#)

<sup>2</sup> [484 Pacific St, Stamford, CT 06902 - Office for Lease | LoopNet](#)

9. Defendant Jennifer Abel is domiciled in Beverly Hills, California, which is the place where she has her true fixed home and to which, whenever she is absent, she intends to return. Thus, Jennifer Abel is a citizen of the State of California.

10. Defendant Melissa Nathan is domiciled in Los Angeles, California, which is the place where she has her true fixed home and to which, whenever she is absent, she intends to return. Thus, Melissa Nathan is a citizen of the State of California.

11. Defendant Justin Baldoni is domiciled in Pasadena, California, which is the place where he has his true fixed home and to which, whenever he is absent, he intends to return. Thus, Justin Baldoni is a citizen of the State of California.

12. Defendant Wayfarer Studios LLC is a limited liability company formed in the State of Delaware. The members of Wayfarer Studios LLC are M & M Films, Inc. and Spring Green Media Capital LLC. M & M Films, Inc. is a corporation formed in the State of California and maintains its principal place of business in California. Therefore, M & M Films is a citizen of the State of California pursuant to 28 U.S.C. § 1332(c)(1). The member of Spring Green Media Capital LLC is Spring Green Media LLC. The members of Spring Green Media LLC are Steven Sarowitz and Jessica Sarowitz. Steve Sarowitz is domiciled in Highland Park, Illinois, which is the place where he has his true fixed home and to which, whenever he is absent, he intends to return. Thus, Steve Sarowitz is a citizen of the State of Illinois. Jessica Sarowitz is domiciled in Highland Park, Illinois, which is the place where she has her true fixed home and to which, whenever she is absent, she intends to return. Thus, Jessica Sarowitz is a citizen of the State of Illinois. In sum, by virtue of the citizenship of its beneficial owners, Wayfarer Studios LLC is deemed to be a citizen of the States of California and Illinois.

13. 28 U.S.C. § 1441(b) provides that “[i]n determining whether a civil action is removable on the basis of the jurisdiction under section 1332(a) of this title, the citizenship of defendants sued under fictitious names shall be disregarded.” Accordingly, the Complaint’s inclusion of John Doe defendants has no bearing on removal. *See Diego Beekman Mut. Hous. Ass’n Dev. Fund Corp. HDFC v. Dish Network, L.L.C.*, No. 15-cv-1094, 2016 WL 1060328, at \*7 (S.D.N.Y. Mar. 15, 2016).

14. The Complaint does not specify the amount in controversy, except that in the Third Cause of Action, Plaintiffs allege that pursuant to a written agreement Wayfarer Studios LLC and Justin Baldoni are obligated to pay a \$25,000 monthly retainer, that such amount has not been paid for the months of September 2024 through December 2024, and that the monthly retainer is owed through May 2025. (Ex. 1, Compl., ¶¶ 123 – 130).<sup>3</sup> Hence, the Complaint alleges that the amount in controversy exceeds \$75,000, exclusive of interest and costs.

15. Moreover, Plaintiffs filed a Commercial Division Addendum to their Request for Judicial Intervention, in which they assert that their claim for damages is \$5 million, excluding punitive damages, interests, costs and counsel fees. (Ex. 1, Commercial Division Addendum). In the Commercial Division Addendum, Plaintiffs certify that the case meets the Commercial Division’s jurisdictional requirements (*id.*), which includes a monetary threshold of \$500,000 for New York County. (22 NYCRR § 202.70(a)).

16. Therefore, pursuant to 28 U.S.C. § 1332, this Court has diversity jurisdiction over the above-captioned action, which may properly be removed to the Court pursuant to 28 U.S.C. §§ 1441 *et seq.*

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<sup>3</sup> The Complaint alleges that Stephanie Jones (in addition to Jonesworks LLC) was damaged by the purported breach of the agreement even though the pleading does not allege that Stephanie Jones is a party to the agreement. (*Id.* ¶ 130).

17. This Notice of Removal is filed within the time provided by 28 U.S.C. § 1446(b) and the Federal Rules of Civil Procedure.

18. Upon filing of this Notice of Removal, Defendants shall give written notice thereof to counsel for Plaintiffs, and Defendants shall file copies of said Notice of Removal with the Clerk, Supreme Court of the State of New York, County of New York.

19. None of the Defendants have been served.

20. By filing this notice, Defendants do not waive any defenses or claims which may be available to them.

Dated: January 27, 2025  
New York, NY

**MEISTER SEELIG & FEIN PLLC**

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